

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Nate Erickson
Amanda Horn &
Susan Bristlin (as joint trustees
for next of kin of Todd Erickson),

Case No. 19-cv-3061 SRN/LIB

Plaintiffs,

**AFFIDAVIT OF COUNSEL
PURSUANT TO MINN. STAT.
§ 145.682**

vs.

Pope County, et al.,

Defendants.

State of Minnesota)
) ss
County of Hennepin)

J. Ashwin Madia, being duly sworn upon oath, states:

1. I am one of the attorneys of record for Plaintiffs and am thoroughly familiar with all of the files, records, and proceedings herein.

2. I have reviewed the facts of this case with an expert whose qualifications provide a reasonable expectation that his opinions could be admissible at trial. In the opinion of this expert, Defendants CentraCare Health System - Long Prairie, Sandra Nimmo, Tom Hock, and Lori Sticha deviated from

the applicable standard of care in their care and treatment of the decedent, Todd Erickson, and by that deviation, caused death to Todd Erickson and injury to the Plaintiffs.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: August 20, 2020

/s/ J. Ashwin Madia
J. Ashwin Madia

Subscribed and sworn to before me this
20th day of August 2020.

/s/Sara Elisabeth Ion

Notary Public, State of Minnesota

My commission expires on January 31, 2025